

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:)	
)	
QADEER AHMED)	Case No. 19-12644-KHK
)	Chapter 13
)	
Debtor)	

MOTION TO APPROVE LOAN MODIFICATION AGREEMENT

COMES NOW, QADEER AHMED, Debtor herein, and through undersigned counsel, Tommy Andrews, Jr. and Tommy Andrews Jr., P.C., pursuant to 11 U.S.C. §363(b)(1) and 363(f) requests this Honorable Court approve the Loan Modification Agreement for certain real property of the Debtor's Estate set forth herein below. As his grounds therefore, he states as follows:

1. Debtor filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code on August 9, 2019.
2. On the date of filing Debtor owned real property known as 6109 Fairfield Pl., Alexandria, VA 22310.
3. Debtor and his wife obtained an agreement from Nationstar Mortgage LLC with favorable terms to modify the Mortgage Loan with a modified unpaid principal balance of \$395,230.51. The post modification interest rate will be 4.1250% beginning September 1, 2021. The post modification principal and interest payment will be \$1,682.68 with variable escrow, starting October 1, 2021. Maturity date is September 1, 2061. Total monthly payment with escrow is \$2,243.10, which is lower than the current payment of \$2,457.82 by \$214.72.
4. The Plan payment will not be increased, because Debtor heavily relies on his children assistance and modification will help him to afford Plan payments.
5. The modification agreement is in the best interest of the Debtors under 11 U.S.C. § 363(h).

WHEREFORE, QADEER AHMED respectfully prays that the Loan Modification Agreement be approved.

QADEER AHMED
By Counsel
/s/ Tommy Andrews, Jr.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing Motion to Approve Loan Modification Agreement was sent via first class mail postage prepaid, or electronically delivered via the electronic court filing system to Chapter 13 Trustee, the U.S. Trustee and also sent via first class mail postage prepaid to: Bank of America, N.A. on this 4th day of October, 2021.

/s/ Tommy Andrews, Jr.

Tommy Andrews, Jr.